IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRGINIA ALEXANDRIA DIVISION

AMDOCS (ISRAEL) LIMITED, an Israeli Corporation,

Case No. 1:10cv910 (LMB/TRJ)

Plaintiff,

V.

OPENET TELECOM, INC., a Delaware Corporation, and OPENET TELECOM LTD., an Irish Corporation,

Defendants.

OPENET TELECOM, INC. AND OPENET TELECOM LTD.'S OBJECTIONS AND COUNTER-DESIGNATIONS TO PLAINTIFF'S DEPOSITION DESIGNATIONS

Defendants Openet Telecom, Inc. and Openet Telecom Ltd. (collectively, "Openet") raise the following objections to Plaintiff Amdocs Limited's ("Amdocs") deposition designations and provide Openet's counter-designations. Openet also reserves the right to move *in limine* for the exclusion of any deposition testimony, or to modify or add additional objections if appropriate. Openet also reserves all rights to object to any deposition testimony at trial on bases other than those stated herein. Furthermore, Openet objects to Amdocs' deposition designations to the extent any designations include attorney colloquy.

Openet notes its objections to Amdocs' trial exhibit designations using the following symbols to refer to each objection:

A	Argumentative
F	Lack of foundation
Н	Hearsay (FRE 802)
ID	Improper designation
IE	Improper expert testimony

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Irrelevant / immaterial (FRE 401-402)
Parol Evidence
Improper lay opinion testimony (FRE 701)
Calls for a legal conclusion
Mischaracterizes testimony or exhibits
Motion to strike
Non-responsive answer
Outside the scope of the 30(b)(6) notice
Lack of personal knowledge (Rule 602)
Privileged communication
Speculative
Unfairly prejudicial
Vague and ambiguous
Document speaks for itself.
Overbroad
Asked and answered.
Calls for a narrative.
Compound
Assumes facts not in evidence.

Witness	Date	Designation	Defendants' Objections	Defendants' Counter- designations
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Respectfully submitted,

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James H. Wallace Jr. (admitted *pro hac vice*)
Eric H. Weisblatt (VSB No. 21561)
Anthony Son (admitted *pro hac vice*)
Brian H. Pandya (VSB No. 72233)
Joseph Shin (VSB No. 79051)
Adrienne Johnson (VSB No. 78631)
WILEY REIN LLP
1776 K Street NW

Washington, D.C. 20006 Telephone: (202) 719-7000 Facsimile: (202) 719-7049

Counsel for Openet Telecom, Inc. and Openet Telecom Ltd.

CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of May, 2011, I served the foregoing Openet Telecom, Inc. and Openet Telecom Ltd.'s Objections and Counter-Designations to Plaintiff's Deposition Designations by email and hand delivery to following counsel for Amdocs (Israel) Ltd.

Gregory H. Lantier, Esq. WilmerHale LLP 1875 Pennsylvania Avenue, N.W. Washington, DC 20006 Gregory.Lantier@wilmerhale.com

/s/	
Joseph Shin	